

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
Civil Division**

MARILYN THOMPSON	:	
	:	
Plaintiff,	:	
	:	
v.	:	Case No.: 8:17-cv-03727-PWG
	:	
DOLLAR TREE STORES, INC., et al.	:	
	:	
Defendants.	:	

**DEFENDANT AMERICAN GREETINGS CORPORATION'S MOTION TO DISMISS,
OR IN THE ALTERNATIVE, MOTION FOR SUMMARY JUDGMENT**

Defendant American Greetings Corporation by counsel, Carr Maloney P.C., and pursuant to Fed. R. Civ. P. 12(b)(6), or in the alternative, Fed. R. Civ. P. 12(d) and 56, and §5-101 of the Courts and Judicial Proceedings Article of the Maryland Code, respectfully moves to dismiss the Amended Complaint filed by Plaintiff, Marilyn Thompson. Plaintiff's claims are barred by Maryland's statute of limitations. Accordingly, American Greetings Corporation should be dismissed with prejudice from the Amended Complaint. In further support of this Motion, American Greetings Corporation refers to the attached Statement of Grounds and Authorities.

AMERICAN GREETINGS CORPORATION
By Counsel

/s/ Paul J. Maloney

Paul J. Maloney, Esquire #02026
Carr Maloney P.C.
2020 K Street, NW, Suite 850
Washington, D.C. 200006
(202) 310-5500 (Telephone)
(202) 310-5555 (Facsimile)
pjm@carrmaloney.com

REQUEST FOR HEARING

Defendant American Greetings Corporation respectfully requests a hearing on the issues raised in this Motion and any opposition thereto.

/s/ Paul J. Maloney

Paul J. Maloney

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing *Defendant American Greetings Corporation's Motion to Dismiss, and in the Alternative for Summary Judgment* was served via the court's electronic filing system, this 7th day of May, 2018, to:

Michael D. Reiter
Chasen and Boscolo
7852 Walker Drive, Suite 300
Greenbelt, MD 20770
Counsel for Plaintiff Marilyn Thompson

Ronald M. Cherry
Bonner Kiernan Trebach and Crociata LLP
711 St. Paul Street
Baltimore, MD 21202
Counsel for Dollar Tree Stores, Inc.

/s/ Paul J. Maloney

Paul J. Maloney